

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

ROBERT DAVID STEELE, et al.,

Plaintiff,

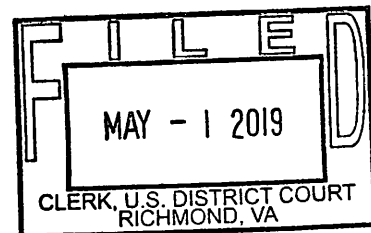
vs.

JASON GOODMAN, et al.,

Defendant

Case No.: 3:17-cv-00601-MHL

DEFENDANT'S OPPOSITION TO THE  
SECOND AMENDED MOTION TO  
INTERVENE



**DEFENDANT'S OPPOSITION TO THE SECOND AMENDED MOTION TO  
INTERVENE**

Defendant Jason Goodman, Pro Se, opposes intervention by Intervenor Applicant

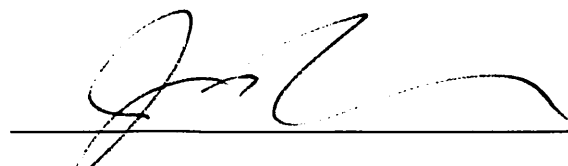
D. George Sweigert (herein after SWEIGERT), both as of right and permissively. Each of Sweigert's three Motions to Intervene are based on fundamentally false premises, materially misleading statements and libelous conclusions made with no basis in fact and no valid supportive evidence. Sweigert's intervention cannot prevail under Fed. R. Civ. Proc. Rule 24 because he fails to assert any valid claim germane to the subject matter of this proceeding and his intervention would unduly delay and prejudice the adjudication of the original parties' rights. Sweigert's fundamentally false premise, false claims and false statements do not give him standing to intervene in this matter. Sweigert's frequent and vexatious filings do not make any legitimate claims for which relief may be granted. Video, audio and other evidence, presently in the public domain refute statements made by Sweigert to this court under penalty of perjury and

DEFENDANT'S OPPOSITION TO THE SECOND AMENDED MOTION TO INTERVENE - 1

1 in violation of 18 U.S. Code § 1001. Sweigert's multiple, lengthy and fundamentally false  
2 applications to intervene have already unduly delayed these proceedings. His inappropriate  
3 interactions with co-Defendant Lutzke and parties directly related to and in continuous contact  
4 with Plaintiff, including his own brother George Webb Sweigert (herein after WEBB), would  
5 undoubtedly prejudice the adjudication of Defendant Goodman's rights and Sweigert should be  
6 denied intervention under Fed. R. Civ. Proc. Rule 24(b)(3).  
7

8 I hereby attest that the pleadings herein are accurate and true under penalties of perjury.  
9 Further, I hereby attest that the attached exhibits are accurate and true copies of source  
10 documents as described. Video and telephone recording transcripts may contain typos due to  
11 voice to text transcription software. True and accurate copies of original video and audio  
12 recordings can be provided should it please the court.  
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15 Signed this 30 day of April 2019  
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19 Defendant, Pro Se Jason Goodman  
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1       **I.       FACTUAL BACKGROUND**

2       Intervenor Applicant Sweigert was unknown to Defendant Goodman prior to May or June  
3 2017. Goodman had begun working with Sweigert's brother, Webb, in April of 2017. Goodman  
4 and Webb produced a series of news broadcasts on YouTube. These broadcasts drew the  
5 attention of Sweigert and he began making his own YouTube broadcasts focused on taunting,  
6 disparaging, threatening and harassing Goodman. Sweigert falsely claims he was dragged into  
7 this situation by Goodman. Sweigert initially antagonized the conflict with Goodman with false  
8 public statements and direct calls to Goodman but has now deleted the video evidence of this  
9 from May and June 2017, denying Defendant and the court access to view it.  
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11       Goodman was not aware of Sweigert until members of Goodman's audience brought  
12 Sweigert's disturbing, seemingly psychotic and threatening broadcasts to Goodman's attention.  
13 Viewers alerted Goodman to these broadcasts out of concern for his personal safety. The  
14 common theme in Sweigert's broadcasts was juvenile disparagement, taunting, threatening and  
15 other methods of harassing and provoking Goodman. It is impossible to provide many of these  
16 broadcasts as evidence because Sweigert is in an ongoing regular practice of deleting his videos  
17 to eliminate evidence of his statements. Sweigert uses these videos to transmit messages to a  
18 network of viewers and then removes the videos after the message has been received. Defendant  
19 did not initially realize the videos were being removed, but has since taken to downloading,  
20 screen capturing, and otherwise recording the videos in an effort to preserve them as evidence.  
21 In doing this, Sweigert demonstrates a deliberate effort to spoliage evidence. Sweigert's pattern  
22 and practice of covering his actions greatly complicates defensive legal measures that might  
23 otherwise stop his persistent cyber harassment, and Defendant believes this is a deliberate abuse  
24 of the legal system.  
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1 In his applications to intervene, Sweigert falsely claims Goodman has targeted him and  
 2 relentlessly pursued him. But in fact, it is Sweigert persistently antagonizing Goodman with  
 3 multiple daily public broadcasts, filled with false statements and taunting accusations frequently  
 4 directly soliciting a response up to and including today as this opposition is bring written.  
 5

6 Sweigert has also persistently harassed numerous guests of Goodman's talk show,  
 7 discouraging anyone who experiences or observes this harassment from participating. This has  
 8 directly damaged Goodman's ability to host show guests and build his business. Sweigert's  
 9 persistence and dedication to these activities is so overt and goes so far beyond seeking to cure  
 10 any alleged damages, it compels an observer to consider what could motivate such behavior.  
 11

12 On page 5 of his second Amended Motion to Intervene (ECF No. 93) Sweigert states  
 13 *"The seminal event in this saga was the infamous Port of Charleston (South Carolina) dirty*  
 14 *bomb hoax on June 14 2017. This "dirty bomb hoax" led to the closure of the Waldo (sic)*  
 15 *Marine Terminal for over eight (8) hours while several federal, state and local response*  
 16 *agencies conducted a Type-III radiological response (equivalent to a jetliner crash) to the*  
 17 *event."* In May 2018, Sweigert self-published a softcover 28 page "book" on this topic entitled  
 18 "Report: The Port of Charleston Dirty Bomb Hoax and Social Media Liability"  
 19 [https://www.amazon.com/Report-Charleston-Dirty-Social-](https://www.amazon.com/Report-Charleston-Dirty-Social-Liability/dp/1717056792/ref=sr_1_fkmrnull_1?keywords=port+of+charleston+dirty+bomb&qid=1556457795&s=gateway&sr=8-1-fkmrnull)  
 20 [Liability/dp/1717056792/ref=sr\\_1\\_fkmrnull\\_1?keywords=port+of+charleston+dirty+bomb&qid](https://www.amazon.com/Report-Charleston-Dirty-Social-Liability/dp/1717056792/ref=sr_1_fkmrnull_1?keywords=port+of+charleston+dirty+bomb&qid=1556457795&s=gateway&sr=8-1-fkmrnull)  
 21 [=1556457795&s=gateway&sr=8-1-fkmrnull](https://www.amazon.com/Report-Charleston-Dirty-Social-Liability/dp/1717056792/ref=sr_1_fkmrnull_1?keywords=port+of+charleston+dirty+bomb&qid=1556457795&s=gateway&sr=8-1-fkmrnull) (EXHIBIT A)  
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24 This book is more accurately described as a bloated propaganda pamphlet and is notably,  
 25 considerably terser than the majority of Sweigert's filings in this legal matter. In the book,  
 26 Sweigert makes a succession of patently false statements and arrives at false conclusions  
 27 intended to damage Goodman's worldwide reputation and serve as false, fabricated evidence in  
 28

1 Sweigert's vexatious legal actions. The title itself indicates the author has arrived at the  
2 conclusion that this incident was a hoax.

3 As Sweigert points out, multiple government agencies including the FBI and U.S. Coast  
4 Guard have investigated this incident and these agencies did not determine the incident was  
5 caused by a hoax. For reference, we can look to another alleged hoax in recent news, the report  
6 of a hate crime by actor Jussie Smollett to the Chicago Police Department.

7 ([https://chicago.suntimes.com/news/petition-investigate-jussie-smollett-case-dropped-2nd-](https://chicago.suntimes.com/news/petition-investigate-jussie-smollett-case-dropped-2nd-request-continue/)  
8 [request-continue/](https://chicago.suntimes.com/news/petition-investigate-jussie-smollett-case-dropped-2nd-request-continue/)). Upon the rapid determination that the report was a hoax, CPD immediately  
9 sought criminal charges against Smollett for filing a false report. After almost two years and a  
10 complete investigation, no such charges have been brought by FBI, USCG, Charleston PD,  
11 NYPD or any other law enforcement agency against Goodman or anyone else related to the  
12 incident in Charleston. In fact, the only people claiming the incident was a hoax are Plaintiff,  
13 Intervenor Applicant and their co-conspirators. Steele first introduced the idea of a false report  
14 in an email sent to Defendant Goodman and Sweigert's brother Webb. **(EXHIBIT B)**. Steele  
15 warns Goodman he is to be arrested by NYPD for calling in a hoax, but no arrest occurred.

16 Sweigert further claims that Goodman deliberately used false information in furtherance  
17 of a scheme to close the Port of Charleston Wando Welch Terminal (incorrectly referenced by  
18 Sweigert as Waldo terminal) to publicize his YouTube show and make money, but this is false.  
19 The information presented to Goodman about a potentially deadly alleged public threat in  
20 Charleston SC was provided by Webb, Sweigert's brother and frequent collaborator. Despite  
21 statements to the contrary, the two can be seen in videos together dating back years, and most  
22 recently on February 8, 2019 (<https://www.youtube.com/watch?v=NNlxpqJrsCA>). The duo can  
23 be observed laughing and reminiscing as Sweigert asks Webb a series of leading questions,  
24

1 possibly attempting to evoke testimony to be used in this or other legal action. Webb provided  
2 Goodman with the information regarding the alleged “dirty bomb” even introducing that specific  
3 term, and he did it with the intent to convince Goodman it was true and correct. Goodman  
4 remains unaware of what, if anything, Coast Guard or FBI discovered as a result of inspecting  
5 the ship or what was discussed during their interrogation of Webb. Goodman has reason to  
6 believe something unusual was found, or for some other reason FBI disagrees with Sweigert  
7 regarding any false report because they have not charged anyone with filing a false report. Law  
8 enforcement typically demonstrates no reluctance whatsoever in prosecuting individuals for such  
9 infractions. ([https://www.washingtonpost.com/news/arts-and-entertainment/wp/2018/04/10/former-silicon-valley-actor-t-j-miller-has-been-charged-with-calling-in-a-fake-bomb-threat/?utm\\_term=.3ba4c3636412](https://www.washingtonpost.com/news/arts-and-entertainment/wp/2018/04/10/former-silicon-valley-actor-t-j-miller-has-been-charged-with-calling-in-a-fake-bomb-threat/?utm_term=.3ba4c3636412)).  
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14 Sweigert’s insistence that someone be “held accountable” for what appears to have been  
15 a good Samaritan acting out of an abundance of caution, could be a factor in his maniacal,  
16 incessant and vexatious litigation of this matter. Contrary to claims made in the second amended  
17 motion to intervene, Sweigert’s applications to intervene are in fact attempts to relitigate the  
18 same exact claims raised in Sweigert’s equally vexatious actions brought first in South Carolina  
19 and then SDNY where judge’s final orders remain pending. Sweigert has shown he is adept at  
20 abusing the legal system and coming up with creative ways to venue shop his punitive legal  
21 actions, including his multiple applications to intervene in this instant action.  
22  
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24 Sweigert’s book further describes “*a panic that bordered on mass hysteria*” but no  
25 evidence of mass hysteria has been shown. It appears most of the general public, even those in  
26 close proximity of the port where totally unaware of the incident until after the port closure was  
27 reported in the news. Webb was questioned by the FBI and Coast Guard immediately following  
28

1 the closure and was not arrested or charged with perpetrating a hoax. This causes Defendant to  
2 believe the FBI and USCG did not determine that a hoax had occurred.

3         Sweigert's book repeatedly refers to Defendant Goodman as an actor. This echoes the  
4 claim made by Plaintiff in his Amended Complaint (ECF No. 39 page 10 subheading 6).

5         Sweigert's book was published on May 1, 2018, while Plaintiff's Amended Complaint  
6 containing this identical false statement was docketed on April 13, 2018. Goodman has never  
7 worked as an actor, never claimed to be an actor and is not an actor. Sweigert's book and his  
8 applications to intervene attempt to conflate the actions of unrelated third parties with those of  
9 Goodman, just as Plaintiff's Amended Complaint does.

10         The final point of note emphasized in Sweigert's book relates to an individual known as  
11 O. Marshall Richards (herein after RICHARDS). Richards was introduced to Goodman by  
12 intervenor applicant's brother Webb and was referred to on Goodman's programs as both Deep  
13 Uranium and Mr. Hudson. These alternate names were given to Richards to protect his identity  
14 as a journalistic source in essentially the same way Sweigert operates online under the self  
15 assigned stage name "Dave Acton". Richard's actual identity was not known to Goodman until  
16 it was revealed by Sweigert on Sweigert's YouTube channel as he describes in his Amended  
17 Motion to Intervene. Sweigert has publicly stated this information was provided to him by co-  
18 Defendant Lutzke and Lutzke confirmed in a phone call she placed to Defendant on April 3,  
19 2019 that she has conspired with Sweigert conducting research and cooperating to defeat  
20 Defendant in this instant lawsuit. Lutzke claimed Sweigert was "working with Robert David  
21 Steele" and Swiebert offered to help her "work this case out."

22 <https://www.youtube.com/watch?v=WwyRPFhW-HE> (EXHIBIT C)

1           The court should also take note that Sweigert's research into the Port of Charleston  
2 matter is so poor, he refers to the site of the closure as the "Waldo" terminal when the actual  
3 name is WANDO terminal. Despite Sweigert's claims of expertise in critical infrastructure and  
4 diligent attention to detail in filing notices of harmless errors, he fails to provide the correct name  
5 of the central location in what he describes as the seminal event around which this entire lawsuit  
6 has emerged. This error shows how little attention Sweigert pays to facts in this matter, rather  
7 focusing attention on vexatious legal challenges. This is a telling clue when evaluating  
8 Sweigert's motivations as well as his flawed conclusions. Sweigert's inability or refusal to  
9 acknowledge facts leads him to false conclusions on foundational points in this matter and his  
10 legal footing rests in quicksand.

13           Sweigert's Amended Motion to Intervene also states that he has sent his report to  
14 congress and any alleged dissatisfaction Defendant may have with this would be a violation of  
15 18 U.S.C. § 1505. However, Sweigert has no authority to initiate official acts of Congress and  
16 the report may well reside in Congressional waste bins where it belongs. Sweigert's alignment  
17 with Plaintiff in motive and actions is further evidenced by Plaintiff's recent association with  
18 U.S. Congressman Devin Nunes in the widely publicized, ill-conceived law suit Plaintiff  
19 encouraged Nunes to initiate against Twitter. Despite the protection of CDA section 230, which  
20 shields Twitter and other social media networks from liability related to content posted by users  
21 of their network, Plaintiff has aggressively pursued Nunes and personally recommended Biss to  
22 bring a suit that legal experts across the political spectrum have derided as guaranteed to fail.

25           Sweigert's Amended Application to Intervene openly states his plan to badger Congress  
26 members with mailings and repeated calls to open an investigation into the port incident.  
27 Sweigert has made multiple video broadcasts in which he boasts of his letter writing campaigns,



1 his attempts to intervene in this legal action as well as his intention to bring the incident in the  
2 Port of Charleston to Nunes' attention, utilizing his connections to this instant lawsuit. While it  
3 seems unlikely that Steele, Biss or Sweigert could have any influence over Congress, this is yet  
4 another clear attempt to intimidate Goodman.  
5

6 Sweigert's self-published book is a tool created to further the goals of threatening,  
7 intimidating and harassing Goodman on a daily basis via social media, false claims made to law  
8 enforcement and military agencies, and now the civil legal system for nearly two full years. The  
9 book is a fabrication from start to finish and in it, Sweigert manipulates the facts surrounding an  
10 incident initiated by his brother Webb, and other associates, after Webb had spent months  
11 gaining Goodman's confidence. The primary claim in the book is that Goodman engaged in  
12 sophisticated cyber warfare techniques in which he has no experience or training, and  
13 "weaponized" social media to stage an attack on the U.S.C.G. According to Sweigert this was  
14 done to earn money and Goodman's activities as a documentary filmmaker and journalist, are  
15 covers for ulterior motives. Sweigert's absurd work of fiction goes on to categorize a single  
16 tweet as a DDoS cyber-attack on the Coast Guard. The tweet allegedly made a total of 8,000  
17 "impressions" during the two-hour broadcast. Although this statement is made in absence of  
18 evidence, it is irrelevant because Twitter can process over 143,199 (one hundred forty-three  
19 thousand one hundred ninety nine) messages per second according to its own informational blog  
20 post of August 2013 [https://blog.twitter.com/engineering/en\\_us/a/2013/new-tweets-per-second-](https://blog.twitter.com/engineering/en_us/a/2013/new-tweets-per-second-record-and-how.html)  
21 [record-and-how.html](https://blog.twitter.com/engineering/en_us/a/2013/new-tweets-per-second-record-and-how.html) (EXHIBIT D) Twitter is not the primary mechanism of communication  
22 utilized by the U.S.C.G. Eight thousand messages would be an inconsequential event, and the  
23 FBI / Coast Guard investigation supports this conclusion.  
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1           Sweigert has conspired together with other parties to this legal action, including co-  
2 Defendant Lutzke and Plaintiff Steele both directly and via third party intermediaries for more  
3 than one year and in an ongoing fashion. Sweigert entered an agreement to create and monetize  
4 a harassment campaign (The Campaign) intended to disrupt the Defendant's business, personal  
5 life and worldwide reputation, and chill Defendant's journalistic investigations.  
6

7           Sweigert has persistently engaged in numerous counts of tortious interference directly  
8 mailing, emailing and contacting through various methods sending numerous letters to  
9 Patreon.com CEO Jack Conte as well as Redbubble.com directly impacting Goodman's ability to  
10 transact business and his financial well being. In addition to disrupting Defendant's business and  
11 personal relationships, The Campaign is also intended to impact the outcome of this legal action.  
12 Sweigert and Plaintiff have published numerous threats to members of the public who might  
13 choose to subscribe to Goodman's show, falsely claiming that they could be named as  
14 defendants in this widely publicized legal action. Steele has published a list of people he's  
15 dubbed "crowdstalkeers" alleged to work for and / or finance Goodman at their own peril and  
16 risk of legal repercussions.  
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19           Among the co-conspirators are Intervenor Applicant's brother George Webb Sweigert  
20 (Webb), Manuel Chavez III aka Defango (Chavez), Frank Bacon, believed to be Tyroan Simpson  
21 (Simpson), Nathan Stolpman (Stolpman), co-Defendant Susan Lutzke aka Susan Holmes aka  
22 Queen Tutt (Lutzke), Steve Outtrim (Outtrim), Dean Fougere aka Titus Frost (Fougere), Kevin  
23 Allen Marsden (Marsden), Mari Rapp aka Sugar Shine (Rapp), Jacquelyn Weaver (Weaver) and  
24 other unknown parties operating under various online aliases.  
25

26           On or around December 2017, in a multiparty video chat that included Simpson,  
27 Sweigert, Chavez, Stolpman and two unknown parties, Simpson and Sweigert agreed to engage  
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1 in a harassment for pay Campaign against Defendant Goodman.

2 (<https://www.bitchute.com/video/Ez5xgxUk8daU/>). Transcript of this chat was included with  
3 Defendant's Opposition to the Motion to Intervene (ECF No. 78 EXHIBIT A) The conspirators  
4 agreed that the monetary component of The Campaign would be transacted via the  
5 cryptocurrency backed social media network Steemit.com (Steemit). Defendant's investigations  
6 have revealed evidence that Steemit.com is a ponzi scheme intended to absorb Bitcoin or other  
7 payments from the public when they join the network and purchase "Steem Power" tokens to  
8 gain voting leverage on the network. Steemit enables a covert method of compensating co-  
9 conspirators in this pay for harassment scheme and is also a money laundering mechanism  
10 intended to hide the source of funds and transform an essentially worthless digital currency into  
11 U.S. Dollars. Simpson is an aggressive proponent of Steemit and actively promotes it online and  
12 elsewhere. ([https://steemit.com/steemit/@frankbacon/block-frank-bacon-on-austin-texas-radio-](https://steemit.com/steemit/@frankbacon/block-frank-bacon-on-austin-texas-radio-tonight-89-1-fm)  
13 [tonight-89-1-fm](https://steemit.com/steemit/@frankbacon/block-frank-bacon-on-austin-texas-radio-tonight-89-1-fm))

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17 Simpson called Goodman on or about June 27, 2017 (<https://youtu.be/-JqDBOusiF8> )  
18 (ECF No. 78 EXHIBIT B) to attempt to convince Goodman to join Steemit.com. After  
19 Goodman refused, Simpson called again to leave a threatening voicemail  
20 ([https://youtu.be/\\_NoCXRvFwVI](https://youtu.be/_NoCXRvFwVI) ) in which he specifically names Chavez and states "guys like  
21 Defango and myself and about 50 other people that really know how to do this shit are gonna  
22 make it a lot more difficult for you to do really about anything" directly referencing the  
23 harassment campaign (ECF No. 78 EXHIBIT C).

24  
25 The original video broadcast has been deleted but was preserved as evidence by  
26 Defendant (<https://www.bitchute.com/video/Ez5xgxUk8daU/>). In the video, Sweigert insists on  
27 a "unified effort" (see transcript ECF No. 78 EXHIBIT A) time stamp 00:01:52,860) in response  
28

1 to Simpson's suggestion for "the best way to get JG" (see attached transcript ECF No. 78  
2 EXHIBIT A) time stamp 00:01:48,479) referring to Goodman as "JG". The two agree to a plan  
3 to initiate a letter writing campaign intended to disrupt Goodman. Simpson offers to get  
4 Sweigert "paid for it in a way that's not connected to the government at all" suggestive of a tax  
5 avoidance scheme and referring to the harassment campaign being financed via Steemit.  
6 Sweigert agrees to do it. (see attached transcript ECF No. 78 EXHIBIT A) time stamp  
7 00:03:29,430). At another point in the video, Sweigert boasts "**I VOLUNTEER TO BE THE**  
8 **LIAISON TO FUCK WITH THESE GUYS THROUGH GOVERNMENT PROCESSES,**  
9 **THROUGH MILITARY PROCESSES, THROUGH LAW ENFORCEMENT**  
10 **PROCESSES**" [emphasis added] (see attached transcript ECF No. 78 EXHIBIT A time stamp  
11 00:02:26,909). Simpson insists on monetizing the effort with Steemit, and since that call, both  
12 them and their co-conspirators have been carrying out this calculated, money making plan.  
13  
14

15 The Campaign remains in effect to this day and includes this lawsuit as well as separate  
16 suits brought by Sweigert on June 14, 2018 in District of South Carolina (2:18-cv-01633-RMG)  
17 which was transferred to SDNY on September 17, 2018 at the order of Judge Richard Marc  
18 Gergel. Now relocated to USDC SDNY (Case 1:18-cv-08653-VEC) U.S. District Court Judge  
19 Valeri Caproni has ordered Sweigert not to "file any further motions or pleadings except in  
20 response to this Order to Show Cause."  
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23 Sweigert has interfered with officers of the court in unrelated matters by contacting the  
24 criminal defense attorney of Michael J. Barden. Barden appeared on Goodman's show to speak  
25 about a wrongful arrest and his distress at the notion of a plea deal being forced on him despite  
26 his requests for Police body camera footage being denied and the prosecutor and his lawyer's  
27 failure to demand this exculpatory evidence. Sweigert took it upon himself to contact Barden's  
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1 Attorney (ECF No. 78 EXHIBIT D) and tell him “Barden has told this worldwide audience that  
2 he does not trust you as an attorney.” Barden’s distrust was appropriate given the failure to  
3 follow instructions and insist prosecutors produce Brady materials in the arrest. Sweigert’s  
4 deliberately vexing letter reached the attorney the day Barden was to appear before the judge  
5 regarding the plea and put Barden at odds with his Attorney. Additionally, Sweigert contacted  
6 the AZ Bar Association and filed a complaint alleging Goodman engaged in unauthorized  
7 practice of law suggesting Barden shouldn’t plead guilty to a crime he didn’t commit. The  
8 complaint was dismissed by the Bar Association with no penalty. (ECF No. 78 EXHIBIT E)  
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11 On February 22, Sweigert sent a letter to the U.S. Coast Guard Sector New York Captain  
12 Jason Tama (ECF No. 78 EXHIBIT F). In the letter, Sweigert makes false claims alleging  
13 Goodman intended to do crime. Sweigert’s incompetence is underscored by his inability to  
14 properly name a corporation owned by Goodman, instead attributing the fictitious and false name  
15 Multimedia Systems Designs, Inc. to Defendant along with fictitious plans of a “dirty bomb  
16 hoax” targeting the port of New York. Prior to the mailing, Defendant was unaware of any such  
17 hoax plan which was invented by Sweigert solely for this letter.  
18

19 Perhaps the most brazen act on the part of Sweigert with regard to his legal filings is his  
20 use of a false address as his official mailing address with the court in his action in SDNY. On  
21 Oct 2, 2018, Sweigert filed a change of address. This was the third address Sweigert utilized in  
22 that legal action in less than one year. When five of Goodman’s pleadings were returned by the  
23 USPS as “ATTEMPTED NOT KNOWN UNABLE TO FORWARD” Defendant called the  
24 USPS and was told by an employee that PO Box 152 was not owned by Sweigert and therefore  
25 the USPS did not consider it a legal address for him. On Oct 26, 2018 Defendant filed a Motion  
26 For Ruling To Show Cause For Providing False Address in an effort to get Sweigert to explain  
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1 what seemed to be a fraudulent address and attempted fraud on the court. On Nov 7, 2018  
2 Defendant filed a Supplement to the Motion For Ruling to Show Cause that included photo  
3 evidence of the returned mail (ECF No. 78 EXHIBIT G). Goodman traveled to the USPS in  
4 Mesa AZ on January 7, 2019 and spoke with employees there. They told Goodman that  
5 Sweigert appeared in the post office on Dec 1, 2018 with the owner of the Box and signed a form  
6 to be added officially. Further investigation has revealed the owner of PO Box 152 to be Mari  
7 Rapp aka Sugar Shine, a frequent contributor to Sweigert's social media activities. Sweigert did  
8 not alert the Court in SDNY that he had traveled to Mesa AZ on December 1, 2018 to make this  
9 change, but rather made false written testimony to cover this action. This is further evidence of  
10 Swieigert's intent to commit fraud on the court in SDNY and elsewhere. Sweigert sent  
11 Defendant a U.S. Postal Money Order for one dollar on Dec 1, 2018 and made a video of himself  
12 doing so (ECF No. 78 EXHIBIT H).

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15 In addition to his harassment for pay letter writing campaign, Sweigert is in the daily  
16 practice of engaging in various cyber stalking and cyber harassment efforts. On November 25,  
17 2017 in coordination with Chavez, Sweigert called in to a live YouTube broadcast titled  
18 "11.25.17.Solving.rar" hosted on a YouTube channel controlled by Chavez  
19 (<https://youtu.be/jK73oCxCGOE>). This video is monetized on Steemit.com.  
20 ([https://steemit.com/news/@defango/red-triangle-zodiac-sevens-exposed-cicada-3301-qanon-](https://steemit.com/news/@defango/red-triangle-zodiac-sevens-exposed-cicada-3301-qanon-twitter-progress-update-11-25-17)  
21 [twitter-progress-update-11-25-17](https://steemit.com/news/@defango/red-triangle-zodiac-sevens-exposed-cicada-3301-qanon-twitter-progress-update-11-25-17)). Transcript of the conversation between Chavez and Sweigert  
22 is attached (ECF No. 78 EXHIBIT I). During that conversation Sweigert tells Chavez "I saw  
23 Robert David Steele (Plaintiff) about three days ago four days ago he was being interviewed but  
24 some lady on a show Deborah still I think or something like that and he did talk about that he  
25 thought Jason was a Mossad operative and a handler and he was hoping all this was going to  
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DEFENDANT'S OPPOSITION TO THE SECOND AMENDED MOTION TO INTERVENE - 14

1 come out of discovery and everything so it's really interesting". This conversation between  
2 Chavez and Sweigert appears to be a pre-planned, staged event specifically intended to propagate  
3 the false claim put forward by Plaintiff. This particular false claim associating Goodman with  
4 Mossad was persistently repeated by Chavez, Sweigert, Plaintiff, Fougere and others including  
5 Webb in an effort to turn public opinion against Defendant and defund Defendant's subscription-  
6 based business. Fougere republished the report from Chavez and when contacted by Defendant  
7 to take the report down and issue a retraction, Fougere maliciously posted childish insults along  
8 with Goodman's private phone number on a monetized post on Steemit, furthering the  
9 harassment for pay scheme, inviting additional cyber harassment and rendering the phone  
10 number nearly useless. ([https://steemit.com/jasongoodman/@titusfrost/threatened-by-jason-  
11 goodman-with-criminal-harassment-what-do-you-think](https://steemit.com/jasongoodman/@titusfrost/threatened-by-jason-goodman-with-criminal-harassment-what-do-you-think)). Fougere persists in his role in this  
12 campaign, profiting from false statements and misleading suggestions about Defendant.  
13  
14

15 Approximately one year ago, Chavez posted an article on Steemit titled  
16 <https://steemit.com/news/@defango/crowdsourcing-the-truth-live-research-on-mossadywood>. In the  
17 article, Chavez claims falsely and definitively "Jason Goodman is on the payroll of a man named  
18 Arnan Milchan. Arnan has Jason doing work partly out of blackmail. Jason was at parties with a  
19 producer named Brian Singer and there were underage boys and girls. Jason was being paid  
20 \$2,788 a week and its (sic) now up to \$3,500 a week." This mirrors statements made by Plaintiff  
21 in video interviews that have since been deleted from YouTube. No evidence is offered to support  
22 these claims, and the insinuation is made that Defendant is fraternizing with or otherwise  
23 cooperating with an accused child rapist. This is yet another persistent theme propagated by the  
24 conspirators involved in the Campaign. This article remains on Steemit.com allegedly having  
25 earned Chavez \$12.29 and has been shared by numerous other users in the indelible blockchain on  
26  
27  
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1 Steemit earning additional untold sums (ECF No. 78 EXHIBIT J). Chavez and other co-  
2 conspirators have demonstrated a penchant for using numerous alternate accounts under false and  
3 misleading names such as “Brain Trust” or “OFA\_ASU” so the true scope of the conspiracy is not  
4 yet known (ECF No. 78 EXHIBIT K).

5  
6 Defendant Goodman is not and has never been associated in any way with Mossad,  
7 Arnan Milchan or the film director and accused rapist Singer. Neither Plaintiff, Intervenor  
8 Applicant, nor any of their co-conspirators have any evidence whatsoever to support these  
9 outlandish claims, yet they continue to promote these false statements publicly and aggressively  
10 with the express intent of damaging Defendant’s worldwide reputation and depriving Defendant  
11 of business and financial opportunities. The rumor was started by the co-conspirators in order  
12 that their network could spread this information to earn money on Steemit and through other  
13 methods, and to play upon rampant, hateful, anti-Jewish sentiment among their fans and viewers.  
14 The Campaign has allowed them to persecute Defendant based solely on his Jewish heritage,  
15 denying him of his constitutional right to presumption of innocence, retarding his financial and  
16 psychological well-being and inciting hate speech and foul threats in live comments from  
17 viewers. The Campaign leverages this totally false claim to defame Goodman and engender  
18 hatred for Defendant throughout the world via the internet.  
19  
20

21 Sweigert, Steele and their co-conspirators engage in a form of acting they call Live  
22 Action Role Playing (LARP). Defendant was initially introduced to this term and its practice by  
23 the co-conspirators in the Campaign. They are in a regular practice of accusing their adversaries  
24 of doing this in a weak effort to deflect attention from their own actions. Through these staged  
25 LARP conversations, false information is planted within seemingly normal live streamed talk  
26 show conversation about current events or other topics, mixing truth with fiction in a manner that  
27  
28



1 makes their false claims seem factual to the uninitiated. These video broadcasts are monetized  
2 on the Steemit network and through other methods including online donations and merchandise  
3 sales, earning money for Sweigert's co-conspirators and making them appear unaffiliated to the  
4 outside observer or investigators by concealing payments and obfuscating direct connections.  
5

6 Goodman has revealed evidence indicating suspicious activity with regard to Steemit,  
7 including a visit to the main corporate office in New York City which consists of only a PO Box  
8 and no actual office or employees despite a market capitalization of over \$400,000,000.00 (four  
9 hundred million U.S. Dollars) at the time of the visit.  
10

11 (<https://www.youtube.com/watch?v=EDMvR2qTtFY&feature=youtu.be&t=70>).

12 Accountingweb.com includes this practice in their list of Top 10 Red Flag Warnings of Fraud.

13 (<https://www.accountingweb.com/aa/auditing/top-10-red-flag-warnings-of-fraud>).

14 Defendant Goodman also conducted an interview with professional derivatives trader and  
15 cryptocurrency commentator Tone Vays in which Vays indicated his evaluation of Steemit's  
16 software white paper revealed problems with the core functionality which amounted in Vays'  
17 estimation to misrepresentation on the part of the founders Daniel Larimer and Ned Scott, and  
18 Vays considered additional evidence of fraud. Vays describes deficiencies in the design which  
19 he claims could easily be used by the designers or others who might be made aware of these  
20 deficiencies, to exploit the system, deceive users and siphon money from the network.  
21

22 (<https://youtu.be/7Cax1CDEcd4>).

23  
24 On August 4, 2018, Defendant revealed evidence including a public internet post by  
25 Chavez which included a typo laden set of instructions for automating Steemit posts and driving  
26 upvotes to increase ponzi scheme style revenue growth on the Steemit network as well as  
27 instructions for moving the cryptocurrency Steem dollars out of the network through a variety of  
28

1 machinations to convert it to “fiat” currency such as U.S. Dollars or Euros (ECF No. 78  
2 EXHIBIT L). This overall process provides content in the form of false and defamatory  
3 statements contained in videos about Defendant as well as tactics and methods to enable anyone  
4 interested in joining the Campaign to earn cryptocurrency on Steemit.com by spreading the false  
5 information, and then laundering that digital currency into actual U.S. Dollars.

6  
7 ([https://youtu.be/B1ag\\_9sqmmk?t=6](https://youtu.be/B1ag_9sqmmk?t=6)) Goodman’s disruption of this pay for harassment and  
8 money laundering scheme being carried out via Steemit may be the primary reason for the  
9 organized harassment campaign.

10  
11 Intervenor Applicant continues to grossly abuse the Federal civil legal system, court  
12 shopping with various suits in multiple states in an attempt to utilize the Justice System as a  
13 strategic weapon to intimidate, harass, defame and financially deprive the Defendant. More  
14 recently, Sweigert has sent a letter of intent to sue in a third district for substantially the same  
15 claims. It is Defendant’s belief that this Maryland based intended action is utilizing the same  
16 tactic as Plaintiff’s original action by including co-Defendants who are in fact, conspiring with  
17 the Plaintiff to enable the action and/or sabotage the defense. Sweigert names his brother Webb  
18 as Defendant, conveniently as Webb resides in Maryland. Defendant Goodman is named in this  
19 action as co-Defendant. It is clear Sweigert has no actual intention to enforce any potential civil  
20 judgement against Webb, but is merely using him as a tool to continue to harass Defendant  
21 Goodman with baseless suits in additional Districts of the U.S. District Court system. (ECF No.  
22 78 EXHIBIT M)

23  
24  
25 Plaintiff Steele has knowingly and repeatedly published false and defamatory statements  
26 intended to damage Defendant. IRS filings and social media publications show that Plaintiff  
27 Steele has paid third parties, many of which run popular YouTube channels, which have

1 coincidentally also published false and defamatory statements, absent sufficient evidence, and  
2 intended to damage Defendant and impact the outcome of this legal action (ECF No. 78  
3 EXHIBIT N).

4  
5 Recorded phone calls and voicemail messages show Simpson admitting in his own words  
6 direct contact with both Intervenor Applicant's Sweigert's brother George Webb Sweigert  
7 (Webb) Plaintiff Steele, Chavez and Stolpman. Simpson states to Defendant Goodman in a  
8 phone call "he (Plaintiff Steele) sent me a text one night he's like hey you know cuz he knows I  
9 been buggin' George (Webb)" (see attached transcript ECF No. 78 EXHIBIT B) time stamp  
10 00:05:51,945). Incidentally this statement contradicts assertions made earlier in the call by  
11 Simpson that he is no longer in communication with Plaintiff Steele. Email, SMS and other  
12 communications including in person meeting took place between Plaintiff Steele and Webb (ECF  
13 No. 78 EXHIBIT O)

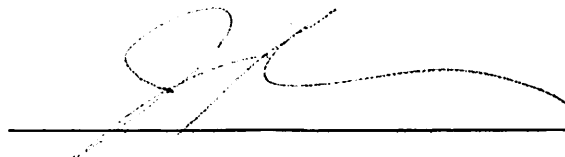
14  
15 Despite false claims of no contact and some form of adversarial relationship, email, text  
16 and other communications including video chat and personal meeting took place between Webb  
17 and his brother, Intervenor Applicant Sweigert (<https://youtu.be/DqGIFBkx09Q>).

18  
19 Plaintiff and his accomplices have engaged in a persistent campaign of harassment and  
20 defamation against Defendant that has consisted of knowingly and deliberately spreading false  
21 information throughout various social media platforms on the internet, intended to damage  
22 Defendant's reputation, business, financial health and psychological well-being and to chill  
23 Defendant's investigative journalism activities which have revealed evidence of crimes.  
24  
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**CONCLUSION**

For the above described reasons, Defendant Goodman respectfully requests that the Court deny D. George Sweigert's Second Amended Motion to Intervene in this matter. Defendant further requests the court recommend the Plaintiff, Intervenor Applicant and alleged co-conspirators to the appropriate law enforcement agencies for criminal investigation and prosecution if found guilty of the alleged criminal activities.

Respectfully submitted,



Jason Goodman, Pro Se  
252 7<sup>th</sup> Avenue Apt 6s  
New York, NY 10001  
[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)

**Circuit Court for** Eastern Division Virginia

**Case No.** 3:17-cv-601-MHL

**City or County**

Robert David Steele and Earth Intelligence Networ

Jason Goodman

**Name**

**Name**

11005 LANGTON ARMS CT

**VS.**

252 7th avenue

6s

**Street Address**

**Apt. #**

**Street Address**

**Apt. #**

OAKTON, VA 22124 (571) 320-8573

New York NY 10001 (323) 744-7594

**City State Zip Code Area Telephone**  
**Code**

**City State Zip Code Area Telephone**  
**Code**

**Plaintiff**

**Defendant**

**CERTIFICATE OF SERVICE**

**(DOMREL58)**

I HEREBY CERTIFY that on this 30 day of April, 2019, a copy  
of the document(s) entitled Motion for leave to extend time to responde to 2nd amended motion to intervene  
**Title of Document(s)**  
was/were mailed, postage prepaid to:

D. George Sweigert

**Opposing Party or His/Her Attorney**

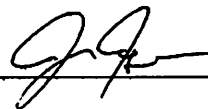
PO Box 152

**Address**

Mesa, AZ 85211  
**City State Zip**

April 30, 2019  
**Date**

**Signature**



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**Case No.** 3:17-cv-601-MHL

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Robert David Steele and Earth Intelligence Networ

Jason Goodman

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**Defendant**

**VS.**

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was/were mailed, postage prepaid to:

Steven S Biss

**Opposing Party or His/Her Attorney**

300 West Main Street, Suite 102

**Address**

Charlottesville, VA 22903

**City**

**State**

**Zip**

April 30, 2019  
**Date**

**Signature**



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New York NY 10001 ( 323 ) 744-7594

**City State Zip Code Area Telephone**  
**Code**

**City State Zip Code Area Telephone**  
**Code**

**Plaintiff**

**Defendant**

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**Title of Document(s)**  
was/were mailed, postage prepaid to:

Terry C. Frank

**Opposing Party or His/Her Attorney**


1021 E. Cary Street, 14th Floor

**Address**

Richmond VA 23219  
**City State Zip**

April 30, 2019  
**Date**

**Signature**



<b>Circuit Court for</b> <u>Eastern Division Virginia</u>		<b>Case No.</b> <u>3:17-cv-601-MHL</u>	
<b>City or County</b>			
<u>Robert David Steele and Earth Intelligence Networ</u>			
<b>Name</b>		<b>Jason Goodman</b>	
<u>11005 LANGTON ARMS CT</u>		<u>252 7th avenue</u>	
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<u>OAKTON, VA 22124 (571) 320-8573</u>		<u>New York NY 10001 (323) 744-7594</u>	
<b>City State Zip Code Area Code Telephone</b>		<b>City State Zip Code Area Code Telephone</b>	
<b>Plaintiff</b>		<b>Defendant</b>	

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**(DOMREL58)**

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**Title of Document(s)**  
was/were mailed, postage prepaid to:

Susan Lutzke  
**Opposing Party or His/Her Attorney**  
2608 Leisure Dr Unit B  
**Address**  
Fort Collins CO 80525  
**City State Zip**

April 30, 2019  
**Date**

  
**Signature**